



**U.S. Department of Justice**

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October 11, 2012

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Re: United States v. Jovhan Saldana et al., 12-10219-NMG

Dear Counsel:

Pursuant to the government's continuing discovery obligations, please find enclosed supplemental information as set forth below. The materials include additional wiretap discovery, including wiretap documents, audio recordings, and preliminary transcripts/synopses from other investigations. Also included are several compact discs containing photographic and video exhibits. Summary indexes are attached to this letter.

**I. Wiretap Discovery**

As set forth in the government's August 27, 2012, discovery letter, the government is aware

of two other wiretap investigations conducted in the District of Massachusetts in which one or more defendants was intercepted and/or named as a Target Subject, including the following:

Wiretaps obtained in M.B.D. No. 11-MC-91145-GAO / *United States v. Vicente et al.*, 12-10248-MLW:

<b>Date of Order</b>	<b>Target Phone No.</b>	<b>User of Target Telephone</b>
06/13/11	(339) 204-3111	Julio Vicente
06/30/11	(978) 397-4505	Jose Rosario
07/13/11	(207) 521-6549	Julio Vicente
07/27/11	(978) 397-4505	Jose Rosario
08/05/11	(978) 885-6128	Jose Rosario
	(978) 397-2808	Julio Vicente
09/21/11	(978) 885-6128	Jose Rosario
10/05/11	(978) 397-9564	Jose Rosario
10/14/11	(978) 397-9324	Julio Vicente
11/07/11	(978) 397-9564	Jose Rosario
11/10/11	(978) 397-9324	Julio Vicente
12/09/11	(978) 397-9564	Jose Rosario
04/12/12	(978) 566-2663	Julio Vicente

Wiretaps obtained in M.B.D. No. 11-91210-DJC / *United States v. Andujar et al.*, 12-10076-NMG:

<b>Date of Order</b>	<b>Target Phone No.</b>	<b>User Of Target Telephone</b>
09/08/11	(617) 888-8560	Ernesto Andujar
09/24/11	(617) 888-8382	Ernesto Andujar
10/14/11	(617) 888-8392	Ernesto Andujar
12/07/11	(857) 389-3319	Ernesto Andujar
01/05/12	(857) 389-3319	Ernesto Andujar
2/10/12	(617) 637-0020	Ernesto Andujar
03/09/12	(617) 637-0020	Ernesto Andujar

Enclosed on compact disks are the following documents relating to these wiretaps: (1) applications for authorization to intercept wire and/or electronic communications; (2) supporting affidavits; (3) orders authorizing the interceptions; (4) orders directing the sealing of intercepted communications under 18 U.S.C. § 2518(a); (5) intercepted audio recordings; and (6) preliminary synopses/transcripts of intercepted communications.

As stated in its discovery letter dated August 27, 2012, there were numerous other wiretaps obtained in connection with these separate investigations in which one or more defendants were named as target subjects and/or may have been intercepted. The government does not intend to offer evidence obtained from these other wiretaps in its case-in-chief. These other applications, supporting affidavits, authorizing orders, sealing orders, audio recordings, and preliminary transcripts/synopses of intercepted communications are available for inspection and copying.

## **II. Additional Exhibits**

In addition, the government is producing numerous photographic and video exhibits, identified by exhibit number, on several compact discs.

The government is aware of its continuing duty to disclose newly discovered additional evidence or material that is subject to discovery or inspection under Local Rules 116.1 and 116.2(B)(1) and Rule 16 of the Federal Rules of Criminal Procedure.


The government requests reciprocal discovery pursuant to Rule 16(b) of the Federal Rules of Criminal Procedure and Local Rule 116.1(D).

Please call the undersigned Assistant U.S. Attorney at (617) 748-3370 if you have any questions.

Very truly yours,

CARMEN M. ORTIZ  
United States Attorney

By:

  
David J. D'Addio  
Assistant U.S. Attorney

Enc.

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*ADDITIONAL NON-DRUG EXHIBITS-COMPACT DISCS*

1.	N-120	Surveillance-100 Stockton St., Chelsea, MA	3/30/2011
2.	N-121	Surveillance-Logan Airport Gate 11, Boston, MA	4/06/2011
3.	N-127	Surveillance-250 Kennedy Dr.	8/09/2011
4.	N-128	Surveillance-1123 Revere Beach Pkway., MA	7/29/2011
5.	N-140	Surveillance-Horadan Way Roxbury, MA	12/16/2011
6.	N-144	Photos-Drug Exhibits 23, 24 & 25 and Ex N-141, N-142 & N-143	12/23/2011
7.	N-167	Surveillance-Winchester, MA	3/07/2012
8.	N-169	Surveillance-Winchester, MA	3/09/2012
9.	N-175	Surveillance-Winchester, MA	4/03/2012
10.	N-177	Surveillance-Winchester, MA	4/09/2012
11.	N-183	Surveillance-Occupants Ma Reg 226MY5 87 Kiely Rd., Dedham, MA	6/19/2012
12.	N-184	Surveillance- 32 Bailey St., Dorchester, MA & Parked Vehicles	6/25/2012
13.	N-283	Photos-Hidden Compartment 2003 Acura Mdx	7/26/2012
14.	N-284	Photos-Hidden Compartment 2008 Honda Crv	7/26/2012
15.	N-287	/video Hidden Compartment of 2001 Volvo V70	7/26/2012
16.	N-290	Surveillance Photos	
17.	N-291	Surveillance100 Stockton St., Chelsea, MA and Prospect St., Lawrence, MA	

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COMPACT DISCS OF ELECTRONIC SURVEILLANCE

*WIRETAPS IN M.B.D. 11-MC-91145-GAO/US v. VINCENTE, et al.* CR 12-10248-MLW

1. Title III Documents
2. 339-204-3111
3. 978-397-4505
4. 207-521-6549
5. 978-885-6128
6. 978-397-2808
7. 978-397-9564
8. 978-397-9324
9. 978-566-2663

*WIRETAPS IN M.B.D. 11-91210-DJC/US v. ANDUJAR, et al.,* CR 12-10076-NMG

1. Title III Documents
2. 617-888-8560
3. 617-888-8382
4. 617-888-8392
5. 857-389-3319
6. 617-637-0020